

**DEPARTMENT OF TOXIC SUBSTANCES CONTROL**

REGION 2

HEINZ AVE., SUITE 200  
BERKELEY, CA 94710-2737

May 23, 1996



Engineering Facilities Activity, West  
Attn: Mr. Richard Powell [1832]  
900 Commodore Drive  
San Bruno, California 94066-5006

Dear Mr. Powell:

**ENGINEERING EVALUATION/COST ANALYSIS SITE IR-3 REMOVAL ACTION  
HUNTERS POINT ANNEX**

The Department of Toxic Substances Control (Department) has reviewed the above report and is forwarding the following and enclosed comments from the Regional Water Board. Since there are shortcomings in the report, the Department will provide general comments.

1. The Department agrees with the Navy to remove source of contamination from impacting the environment. However, the EE/CA has not provided enough information to evaluate the objectives, scope, extent and the criteria for such removal action. We ask the Navy, to ensure that the objectives are identified, articulated and retained throughout the report. Without clarity in scope, goal and objective, the report will be confusing.
2. We have found the Executive Summary to be incomplete and perplexing. This is particularly disconcerting, since we have already conveyed similar concerns to the Navy on several occasions. For example, the Executive Summary states, "affected soils and floating product will be addressed, however, the removal action is not designed to specifically remediate groundwater". The Navy needs to translate what it means to "address" floating product. Does "address" mean "removal" or "control" of contamination? In addition, it is not even clear if the concern is with contaminated soil and/or groundwater. The Executive Summary should state the chemicals of concern in addition to preferred alternative.



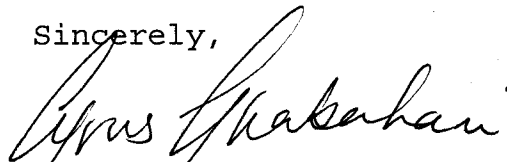
3. To undertake this removal action, there are two objectives as stated in the report. The first objective scopes the removal action to "limit potential migration of oily waste to soils and surface water" and second, to "minimize further degradation of ground-or surface water resources through hazardous substance removal or control". It is not clear if the objective of this removal action is to "remove hazardous substances and oily waste" from both soil and groundwater. And if the focus of the removal action is on contaminated soil, the Navy should justify why contaminated groundwater is not going to be removed.
4. The second objective states "removal or control" of hazardous substances. Which one is it? The Navy should articulate if the contaminants will be removed or controlled. It is also important that alternatives are parallel with the objectives. It seems that alternative two centers on reducing the potential "human exposure" to contamination. This objective is in contrast to what is stated in the report.
5. Another area of ambiguity is the delineation of area of concern. We are unable to understand how the extent of contamination has been determined. Since the removal action is based on visible oily waste, it is not clear why the Navy has provided comparison criteria. We are not sure if contaminated soil above and below water table and groundwater are going to be removed. Will the contaminated soil above and below water table be removed to HP Ambient Levels? The Hunters Point soil Ambient Levels need to be accurately stated. Further, the extent of "hazardous substances" is not delineated. Without understanding the nature and extent and the scope of the removal action, it will be premature to discuss the area of concern, removal action remedial alternatives, project boundary and finally ARARs.
6. The discussion and chronology of ARAR solicitation from the Department is not relevant to the IR-3 EE/CA and should be deleted. The letters from the Navy and the Department are both part of the administrative records. To reiterate our position, as it was stated in the meeting of 1/30/96, the Department responded appropriately to the letter received from the Navy. The Department has forwarded state ARARs on many occasions. Further, to assist the Navy, the Department hosted an ARAR meeting where several state agencies and departments participated.

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In conclusion, we ask the Navy to revise the report to reflect the above issues. We are in agreement with the Navy that with available information, a removal action could be appropriately planned.

Should you have any questions regarding this letter and would like to seek clarification, please call me at (510) 540-3821.

Sincerely,



Cyrus Shabahari  
Project Manager  
Office of Military Facilities

Enclosure

cc: US EPA, Region IX  
Attn: Anna-Marie Cook  
Mail Code H-9-2  
75 Hawthorne Street  
San Francisco, California 94105

Regional Water Quality Control Board  
Attn: Richard Hiett  
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## STATE OF CALIFORNIA

PETE WILSON, Governor

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN FRANCISCO BAY REGION

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VIA FACSIMILE

510.540.3819

Mr. Cyrus Shabahari

DTSC, Office of Military Facilities

700 Heinz Avenue

Berkeley, CA 94710

May 23, 1996

File: 2169.6032

RE: **ENGINEERING EVALUATION/COST ANALYSIS SITE IR-03, WASTE OIL  
RECLAMATION PONDS - HUNTER'S POINT ANNEX (HPA)**

Dear Mr. Shabahari:

Regional Board Staff have reviewed the document and have the following comments:

The preferred *alternatives* presented would remove or "encapsulate" a large portion of source soil pollution and Non Aqueous Phase Liquid (NAPL). Board staff strongly support the Navy in their desire to remove polluted soils and NAPL from the IR-03 site. However, why propose a final remedy for unsaturated soils but not saturated soils (groundwater)? It is not clear how the preferred *alternatives* 2 and 4 consider the "actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants." How can this be achieved when "groundwater in contact with the waste oil at the site is not a target medium of concern for this removal action." Why are only soils that are "... largely at or near the surface that may migrate" considered appropriate for this removal action? Groundwater and soils both need to be addressed concurrently. Board staff met with the Navy and regulatory agencies on February 7, 1996 to discuss removal actions proposed on different parcels. The outcome was to prioritize these removal actions by considering the following criteria:

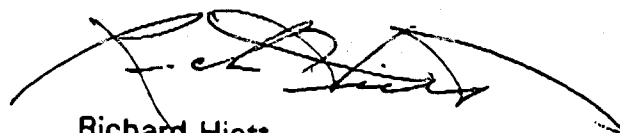
- Cost;
- Minimizing discharge to the bay;
- Timing in regards to schedules, the implementation timeframe etc.;
- Is the removal action a final or interim measure;
- ARARs;
- Threat to the bay (ecological and human).

EE/CA IR-03  
HPA

Currently only alternative 6, with the addition of regional groundwater pumping as part of a final remedy to ensure migration control, or alternative 5 would address most of these concerns.

Board staff would like to meet with the Navy and again discuss this removal action in light of these criteria prior to publication of the final document.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Hiatt", with a large, sweeping flourish extending from the end of the signature.

Richard Hiatt  
Groundwater and Waste Containment  
Division